DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 1997) Docket No. R97-1

NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS PAUL G. SECKAR (NDMS/USPS-T26-1-10)
(November 6, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc., proceeding jointly herein, hereby submit the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

William J. Olson
John S. Miles
Alan Woll
John F. Callender, Jr.
William J. Olson, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3823
(703) 356-5070

Counsel for Nashua Photo Inc., District Photo Inc.,
Mystic Color Lab, and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

William J. Olson

November 6, 1997

NDMS/USPS-T26-1.

a. Please confirm that the FSM used for the field test at the Albany, NY P&DC and described in LR-H-169 was a pre-production model of machines subsequently purchased by the Postal Service and was specifically obtained (rented?) for the purpose of the test. If you do not confirm, please explain the status of the machine described in LR-H-169.

b. Are production models of the FSM 1000 that have subsequently been purchased and installed at Postal Service facilities identical to the model used in the test described in LR-H-169? If not, please describe all differences, including but not limited to those that alter the speed of operation, average productivity (throughput), staffing level, and range of pieces machinable.

NDMS/USPS-T26-2.

a. Has the Postal Service run any tests on production models of the FSM 1000 that are similar to the tests reported in LR-H-169? That is, are any more recent data available for the FSM 1000s currently installed at Postal Service facilities?

b. Are the data reported in LR-H-169 still considered the best data available for the FSM 1000? Unless your answer is an unqualified affirmative, please provide a copy of more recent data which update and/or supercede those in LR-H-169.

NDMS/USPS-T26-3.

According to the machinable flat mail standards shown in LR-H-169, the FSM-1000 can handle pieces with a minimum and maximum thickness of 0.008 and 1.25, respectively.

Please confirm that the minimum and maximum thickness stated there are in inches. If you do not confirm, please provide the appropriate reference (*e.g.*, centimeters).

NDMS/USPS-T26-4.

a. According to the machinable flat mail standards shown in LR-H-169, the FSM-1000 can handle pieces with a minimum and maximum weight of 0.07 and 105.0 ounces, respectively. Do the standards of the FSM enable routine processing of flats that weigh less than one-tenth of one ounce? Is this a correct interpretation of the minimum weight of 0.07? Please explain any answer that is not an unqualified affirmative.

b. Do the standards of the FSM enable routine processing of flats that weigh less than one ounce (*i.e.*, flimsies)? Please explain any answer that is not an unqualified affirmative.

c. Were flimsies included in any of the test runs described in LR-H-169? If so, did they present any problems, such as induction jams, transport jams, damaged pieces, flyouts, missorts, etc.?

d. Has the Postal Service run any test designed to ascertain the machinability of flimsies on the FSM-1000? If so, please provide the results of such tests.

e. Aside from tests specifically designed for sorting flimsies, has the Postal Service collected and recorded any data which reflect experience with sorting flimsies on the FSM-1000? If so, please provide.

NDMS/USPS-T26-5.

a. Please refer to LR-H-169 and confirm that for Category 1 mail the jam rate per 1000 pieces fed to the FSM 1000 was 0.52, 0.17, and 0.43 for, respectively, operations 141, 143, and 146.

b. Are these still the best data available on the jam rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.

c. What are the comparable jam rates on FSM 881s?

NDMS/USPS-T26-6.

a. Please refer to LR-H-169 and confirm that the missort rate for Category 1 mail fed on the FSM 1000 was 0.9 percent, 0.8 percent, and 2.8 percent for, respectively, operations 141, 143, and 146.

b. Are these still the best data available on the missort rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.

c. What are the comparable missort rates on FSM 881s?

NDMS/USPS-T26-7.

a. Please refer to LR-H-169 and confirm that the misface rate for Category 1 mail fed on the FSM 1000 was 0.8 percent, 0.7 percent, and 1.2 percent for, respectively, operations 141, 143, and 146.

b. Are these still the best data available on the misface rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.

c. What are the comparable misface rates on the FSM 881s?

NDMS/USPS-T26-8.

a. Please refer to LR-H-169 and confirm that the reject rate for Category 1 mail fed on the FSM 1000 was 0.2 percent, 0.2 percent, and 0.3 percent for, respectively, operations 141, 143, and 146.

b. Are these the best data available on the reject rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.

c. What are the comparable reject rates on FSM 881s?

NDMS/USPS-T26-9.

a. Please refer to LR-H-169 and confirm that the damage rate for Category 1 mail fed on the FSM 1000 was 0.07, 0.00, and 0.06 pieces per 1,000 pieces fed, for, respectively, operations 141, 143, and 146.

b. Are these the best data available on the damage rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.

c. What are the comparable damage rates on FSM 881s?

NDMS/USPS-T26-10.

a. Please refer to LR-H-169, and after taking account of jam rates, missort rates, misface rates, reject rates, and damage rates, what is the net percent of **Category 1** mail that can be processed successfully on the FSM 1000 without any problem?

b. What is the comparable net percent of **Category 1** mail that can be processed successfully on the FSM 881s without any problem?

c. What is the net percentage of **Category 2** mail that can be processed successfully on FSM 1000s?

d. What is the net percentage of **Category 2** mail that can be processed successfully on FSM 881s?

e. What is the net percent of mail that is less or greater than the Model 881 machinable standard (manual case mail) that can be processed successfully on FSM 1000s?